

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ELIZABETH MARTIN

PLAINTIFF

v.

CAUSE NO. 3:20-cv-460-CWR-LGI

PATRICIA MARSHALL

DEFENDANT

**DEFENDANT’S OPPOSITION TO PLAINTIFF’S REQUEST
FOR AN EXTENSION OF TIME**

COMES NOW, Defendant, Patricia Marshall, and files this her opposition to Plaintiff’s request for an extension of time to file a response and would state to wit:

1. On November 4, the Defendant filed a motion for summary judgment along with a supporting memorandum. [*ECF Doc. #57 and #58*].

2. On the same day, the Plaintiff filed three motions: (1) Motion for an Injunction along with a supporting memorandum [*ECF Doc. #52 and #53*]; (2) Motion for Partial Summary Judgment along with a supporting memorandum [*ECF Doc. #54 and #55*]; and (3) Motion to Seal with no supporting memorandum. [*ECF Doc. #57*].

3. Both sides are given 14 days under the Local Rules to file a response.

4. In the interim of those 14 days, Patricia Marshall filed her rebuttal in regards to her motion to dismiss. [*ECF Doc. #59*].

5. Despite having scheduling conflicts, Patricia Marshall was able to file her response to all three motions filed by the Plaintiff within those fourteen days.

6. Patricia Marshall asks that this Court deny the Plaintiff’s request for an extension of time as Patricia Marshall is seeking for a resolution of this case. Granting an extension by eleven days will unnecessarily delay the adjudication of these motions.

7 However, should this Court grant an extension, Patricia Marshall asks that the deadline be extended only until November 22, 2021.

This the 19th day of November, 2021.

Patricia Marshall, Defendant

BY: /s/Christian Medina

Christian Medina (MSB#105708)

OF COUNSEL:

Christian Medina (MSB#105708)

Danks, Miller & Cory

213 S. Lamar Street (39201)

Post Office Box 1759

Jackson, Mississippi 39215-1759

Telephone: 601/957-3101

Facsimile: 601/957-3160

CERTIFICATE OF SERVICE

I hereby certify the foregoing pleading was filed electronically with the Clerk of Court and served on the following persons using the CM/ECF:

Wayne E. Ferrell, Jr.

Law Offices of Wayne E. Ferrell, Jr.

P.O. Box 24448

Jackson, MS 39225

/s/Christian Medina

Christian Medina